

EXHIBIT “D”

1 UNITED STATES DISTRICT COURT

2 WESTERN DISTRICT OF TEXAS

3 WACO DIVISION

4 --oo--

5 SBI CRYPTO CO., LTD.,)
6 Plaintiff,)
7 vs.) 6:23-cv-252-ADA-JCM
8 WHINSTONE US, INC.,)
9 Defendant.)

10
11 ** Confidential -- Attorneys' Eyes Only **

12 _____
13 VIDEO DEPOSITION OF

14 JONATHAN TANEMORI

15 August 15, 2024

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17 DEPOSITION OF JONATHAN TANEMORI, produced as
18 a witness, duly sworn by me at the instance of the
19 DEFENDANT, was taken in the above-styled and numbered
20 cause on August 15, 2024, from 9:01 A.M. to 5:16 P.M.,
21 before BRANDON D. COMBS, CSR, RPR, in and for the State
22 of Texas, reported by computerized machine shorthand
23 at:

24 2728 North Harwood Street, Fifth Floor,

25 Dallas, Texas

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Transcript of Jonathan Tanemori

Conducted on August 15, 2024

15

1 A. I'm no longer part of SBI. 09:11:52

2 Q. When did you leave SBI? 09:11:55

3 A. I left in March of this year, 2024. 09:11:57

4 Q. And where do you work now? 09:12:01

5 A. I'm self-employed. 09:12:03

6 Q. And so are you being compensated in order 09:12:05

7 to appear here to testify? 09:12:10

8 A. Yes. 09:12:13

9 Q. And how are you being compensated? 09:12:13

10 A. Through an hourly rate through SBI Crypto. 09:12:16

11 Q. And is there a written agreement that 09:12:23

12 exists between you and SBI Crypto that lays out the 09:12:25

13 terms of your compensation for testifying here 09:12:28

14 today? 09:12:30

15 A. There is a draft that has not been fully 09:12:31

16 executed yet. 09:12:34

17 Q. And when you left your association with 09:12:35

18 SBI Crypto, what was your title? 09:12:39

19 A. It was the general manager for SBI Crypto, 09:12:40

20 among other titles. 09:12:45

21 Q. And when you say among other titles, what 09:12:50

22 were those other titles? 09:12:52

23 A. It would be deputy general manager at 09:12:54

24 SBI Investment. 09:12:58

25 Q. Any others? 09:13:03

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Transcript of Jonathan Tanemori

Conducted on August 15, 2024

43

1 Q. (BY MR. SLOVAK) And where do you work 09:51:04
2 now? 09:51:05

3 A. I'm self-employed. 09:51:05

4 Q. Self-employed. I saw in some of your 09:51:08
5 background something about a place called Primal 09:51:10
6 Capital? 09:51:14

7 A. Yes. 09:51:14

8 Q. What is that? 09:51:16

9 A. That's a Web3 investment VC fund. I was 09:51:17
10 there for three months and it wasn't quite what I 09:51:21
11 was looking for and am no longer part of that firm. 09:51:24

12 Q. And what is the hourly compensation that 09:51:26
13 you're being paid to testify here today? 09:51:29

14 A. Here's 400 U.S. dollars per hour. 09:51:31

15 Q. And is that also for time in preparing and 09:51:34
16 travel? 09:51:36

17 A. I believe it is included. 09:51:37

18 Q. And prior to today, what did you do in 09:51:38
19 order to prepare for this deposition? 09:51:42

20 A. I met with Winstead a handful of times to 09:51:46
21 look over some of the documents, primarily the 09:51:50
22 hosting service agreement, the complaint, the 09:51:53
23 numbers that Carson has provided, and a few emails. 09:51:58

24 Q. When you say you met with Winstead, with 09:52:03
25 whom did you meet? 09:52:06

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Transcript of Jonathan Tanemori

Conducted on August 15, 2024

294

1 CERTIFICATE OF REPORTER

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3 I, BRANDON D. COMBS, a Certified Shorthand
4 Reporter, hereby certify that the witness in the
foregoing deposition was by me duly sworn to tell
the truth, the whole truth, and nothing but the
truth in the within-entitled cause;5
6 That said deposition was taken in
shorthand by me, a disinterested person, at the time
7 and place therein stated, and that the testimony of
the said witness was thereafter reduced to
8 typewriting, by computer, under my direction and
supervision;9
10 That before completion of the deposition,
review of the transcript was requested. If
requested, any changes made by the deponent (and
provided to the reporter) during the period allowed
11 are appended hereto.12
13 I further certify that I am not of counsel
or attorney for either or any of the parties to the
said deposition, nor in any way interested in the
event of this cause, and that I am not related to
14 any of the parties thereto.15
16 DATED: August 29, 202417
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BRANDON D. COMBS
RPR, Texas CSR 10927, California CSR 12978